

EXHIBIT C

UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JOHN O'HARA,

17-cv-4766 (ILG) (SMG)

Plaintiff,

-against-

SUBPOENA DUCES TECUM

THE CITY OF NEW YORK, PATRICIA L. HYNES, as
Administrator of the Estate of Charles J. Hynes,
ASSISTANT DISTRICT ATTORNEY JOHN P. O'MARA,
ASSISTANT DISTRICT ATTORNEY ANGELO M.
MORELLI, ASSISTANT DISTRICT ATTORNEY DINO
AMOROSO, DISTRICT ATTORNEY INVESTGATOR
ALLEN PRESSER, ASSEMBLYMAN JAMES F. BRENNAN,
JOHN W. CARROLL, ESQ., JOHN KEEFE and JEFFREY WAITE,
ESQ.

Defendant.
-----X

THE PEOPLE OF THE STATE OF NEW YORK

To: New York State Board of Elections
40 North Pearl Street
5th Floor
Albany, NY 12207

To the Person Summoned: You are commanded to make available the documents and tangible items designated and described below:

- a. Any and all documents related to: reports, worksheets, vouchers, indexes, memo book entries, logs, bulletins, correspondence, emails, audiotapes, videotapes, transcripts, notes, memoranda, receipts, witness statements, and other records maintained and prepared by the New York State Board of Elections and any record generated by the New York State Board of Elections in the possession, custody and control of the New York State Board of Elections regarding the investigation by the Board of Elections into the activities of John O'Hara.
- b. Any correspondence, memos, emails, letters sent to the New York State Board of Elections regarding John O'Hara, including but not limited to a June 28, 1994, letter from Assemblyman John Brennan to the New York City Board of Elections and a July 11, 1994 correspondence from the Board of Elections Council to Brennan.

- c. Any and all notes, memos, correspondence from or to Special Deputy Counsel Jeffrey Waite, including but not limited to a "Confidential Memorandum" from Waite to the Board of Commissioners dated June 19, 1995.
- d. Any and all notes, memo's, correspondence provided at a meeting between Wait, an unknown Board Investigator, Brennan and Jack Carroll on August 31, 1995.
- e. Any and all papers, motions or petitions, including but not limited to a motion to unseal an election case involving John O'Hara on or about January 27, 1996 including but not limited to affirmations and affidavits supporting any claims or petitions.
- f. Waite's correspondence sending his file to the kings County District Attorney's office including contents of said file including but not limited to a confidential memorandum to the Board of Commissions dated November 14, 1996.
- g. Any and all documents, emails, etc pertaining to communications concerning Jeffrey Waite, John Carroll, James Brennan, John O'Mara, John Keefe, Jean Keefe, Charles Hynes and Allen Presser.

At the law offices of Kelly, Grossman & Kerrigan, LLP, located at 1248 Montauk Highway, West Islip, NY 11795 on March 11, 2022 to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

This Subpoena Duces Tecum is issued by the attorney for and on behalf of John O'Hara.

Dennis Kelly, Esq.
Name of Attorney

2205151
New York State Bar Number

1248 Montauk Highway
Office Address

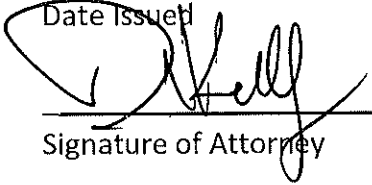
631-314-4996
Telephone Number

West Islip, NY 11795
City, State & Zip Code

516-686-6771
Facsimile Number of Attorney

February 11, 2022
Date Issued

dkelly@kgkfirm.com
Email Address of Attorney

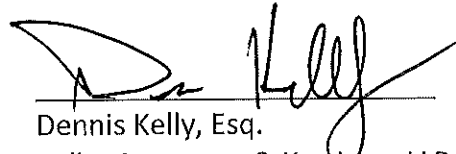

Signature of Attorney

To the Person Summoned:

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

FAILURE TO COMPLY with this subpoena is punishable as contempt of court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed fifty dollars and all damages sustained by reason of your failure to comply.

Dated: West Islip, New York
February 11, 2022

A handwritten signature in black ink, appearing to read "D. Kelly", is written over a horizontal line.

Dennis Kelly, Esq.
Kelly, Grossman & Kernigan, LLP
Attorney for Defendant
1248 Montauk Highway
West Islip, New York 11795
(631) 314-4996